

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

M.J.J.,

Plaintiff,

Civil Action No. 15-cv-433-wmc

v.

POLK COUNTY SHERIFF'S DEPARTMENT
AND DARRYL L. CHRISTENSEN,

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

AFFIDAVIT OF LIDA M. BANNINK

STATE OF WISCONSIN)
) ss.
COUNTY OF ST. CROIX)

LIDA M. BANNINK, being first duly sworn, on oath deposes and states as follows:

1. I am attorney licensed in the State of Wisconsin.
2. I am one of the attorneys representing Plaintiff, M.J.J., in the above-captioned matter.
3. I make this Affidavit in support of Plaintiff's Response to Defendant Wisconsin County Mutual Insurance Corporation's Motion for Summary Judgment.
4. Attached are true and correct copies of the following documents;

EXHIBIT A: Exhibit 1 (Polk County Wisconsin Job Description) from Darryl Christensen's deposition taken on May 18, 2016.

EXHIBIT B: Exhibit 12 (Polk County Jail Policy and Procedures Manual I-300 Inmate Rules) from Scott Nargis' deposition taken on June 2, 2016.

- EXHIBIT C: Exhibit 13 (Polk County Jail Policy and Procedures Manual I-100 Inmate Rights) from Scott Nargis' deposition taken on June 2, 2016.
- EXHIBIT D: Exhibit 14 (Polk County Jail Inmate Handbook) from Scott Nargis' deposition taken on June 2, 2016.
- EXHIBIT E: Polk County Jail Policy and Procedures Manual G-400 Library received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT F: Polk County Jail Policy and Procedures Manual G-500 Exercise and Recreation received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT G: Polk County Jail Policy and Procedures Manual C-900 Corrections Officer Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT H: Polk County Jail Policy and Procedures Manual C-902 Shift Supervisor Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT I: Polk County Jail Policy and Procedures Manual C-903 Master Control Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT J: Polk County Jail Policy and Procedures Manual C-904 Floor Officer Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT K: Polk County Jail Policy and Procedures Manual C-905 Secure Control Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department

Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.


EXHIBIT L: Polk County Jail Policy and Procedures Manual C-906 Minimum Control Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.

EXHIBIT M: Defendant Christensen's training certificates received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.



Lida M. Bannink

Subscribed and sworn to before me this
8th day of July, 2016.


Notary Public, State of Wisconsin
My Commission Expires: 1/1/18

